

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

LISA GEDNEY,

Plaintiff,

-against-

AFFIDAVIT

DOLGEN NEW YORK, LLC, incorrectly
sued as DOLLAR GENERAL
CORPORATION, and DOES 1-10, et. al.,

Civ. Action No.: 6:24-CV-06244 (EAW)

Defendants.

STATE OF TENNESSEE)
COUNTY OF DAVIDSON)

ss:

ADAM ZAGER, being duly sworn, deposes and says:

1. I am employed as Vice President of Risk Management by Dollar General Corporation and have been since January 1, 2022. My office is located at 100 Mission Ridge in Goodlettsville, Tennessee.

2. I submit this Affidavit based on my review of corporate documents kept in the normal course of Dollar General Corporation's business and my personal knowledge of Dollar General Corporation and the corporate structure and dealings of other corporate entities related to Dollar General Corporation.

3. Dollar General Corporation is a Tennessee corporation.

4. Dollar General Corporation does not presently own or lease the Dollar General store located at 4419 Dewey Avenue, Greece, New York¹ and did not own or lease the store on April 11, 2023.

5. Dollar General Corporation does not presently operate the Dollar General store located at 4419 Dewey Avenue, Greece, New York and did not operate the store on April 11, 2023.

6. Dollar General Corporation does not presently employ the individuals working at the Dollar General store at 4419 Dewey Avenue, Greece, New York and did not employ any individuals working at the store on April 11, 2023.

7. Dollar General Corporation does not presently have an office or transact business in Monroe County, New York or anywhere in the State of New York and did not have an office or transact business there on April 11, 2023.

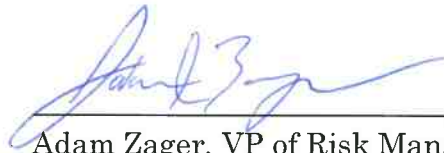
8. Dolgen New York, LLC operates the Dollar General store at 4419 Dewey Avenue, Greece, New York and all other Dollar General stores in the State of New York; Dolgen New York, LLC is a fourth-tier subsidiary of Dollar General Corporation.

9. As is relevant here, Dollar General Corporation performs a number of administrative functions for Dolgen New York, LLC. However, Dollar General Corporation does not operate any Dollar General stores in New York or control the day-to-day operations, including the hiring, retention, discipline or firing of employees, of any Dollar General store in New York. As such, Dollar General

¹ The Complaint in this case asserts the store was in Rochester, New York, but it is located in Greece.

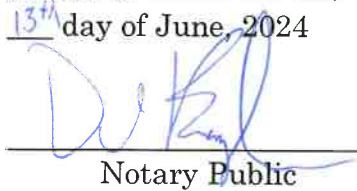
Corporation cannot be said to exercise complete dominion or control over its fourth-tier subsidiary, Dolgen New York, LLC.

10. I understand that this Affidavit will be submitted by Dollar General Corporation in the above-styled case.



Adam Zager, VP of Risk Management

Sworn to before me this
13th day of June, 2024


Notary Public